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Attorneys for

GOOGLE LLC

UNITED STATES DISTRICT COURTS

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF GOOGLE
LLC'S RESPONSE TO PLAINTIFFS'
MOTION TO EXCLUDE CERTAIN
OPINIONS AND TESTIMONY OF
GOOGLE'S EXPERTS DONNA HOFFMAN,
JOHN BLACK AND CHRISTOPHER
KNITTEL [DKT 473]**

Date: May 15, 2025

Time: 1:30 p.m.

Ctrm: 3 - 17th Floor

Judge: Hon. Richard Seeborg

Action Filed July 14, 2020

Trial Date: August 18, 2025

DECLARATION OF EDUARDO E. SANTACANA ISO GOOGLE LLC'S
RESPONSE TO PLAINTIFFS' MOTION TO EXCLUDE [DKT 473]

Case No. 3:20-CV-04688 RS

I, Eduardo E. Santacana, declare that:

1. I am an attorney licensed to practice law in the State of California and a partner with the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34th Floor San Francisco, California 94104, counsel for Defendant Google LLC (“Google”) in the above-captioned action. I have personal knowledge of each fact stated in this declaration, to which I could and would competently testify if called as a witness.

2. I submit this declaration in support of Google’s Response to Plaintiffs’ Motion to Exclude Certain Opinions and Testimony of Google’s Experts Donna Hoffman, John Black And Christopher Knittel [Dkt 473].

3. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of the transcript from the Deposition of Eric Miraglia, taken on October 25, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of an internal document from Google, produced with the Bates stamp GOOG-RDGZ-00186830.

5. Attached hereto as **Exhibit C** is a true and correct copy of an internal document from Google, produced with the Bates stamp GOOG-RDGZ-00149527.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: April 24, 2025

s/ Eduardo E. Santacana

Eduardo E. Santacana